

UNITED STATES DISTRICT COURT

for the

Northern District of Iowa

United States of America

v.

Matthew David Keirans,
also known as "William Donald Woods"

Defendant(s)

Case No. 23-CR-1020

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of August 19, 2016 - May 23, 2022 in the county of Dubuque in the
Northern District of Iowa, the defendant(s) violated:

Code Section

18 U.S.C. § 1014
18 U.S.C. § 1028A

Offense Description

False Statements to a National Credit Union Administration Insured Institution
Aggravated Identity Theft

This criminal complaint is based on these facts:

See attached Affidavit.

☒ Continued on the attached sheet.

☐ Sworn to before me and signed in my presence.

☒ Attested to by the applicant in accordance with the requirements of Fed. R. Crim. P. 4.1 by telephone or other reliable electronic means.

Date: 08/29/2023

Northern District of Iowa



Complainant's signature

Daniel F. Peczu, FBI Special Agent

Printed name and title



Judge's signature

MARK A. ROBERTS, United States Magistrate Judge

Printed name and title

AFFIDAVIT IN SUPPORT OF A CRIMINAL COMPLAINT

UNITED STATES OF AMERICA)
NORTHERN DISTRICT OF IOWA)

Case No. 23-CR-1020

I, Daniel F. Peczuh, being first duly sworn, hereby depose and state as follows:

1. I make this affidavit in support of an application for a criminal complaint against Matthew David Keirans, also known as "William Donald Woods," for violations of Title 18, United States Code, Section 1014 (False statements to a National Credit Union Administration ("NCUA") insured institution) and Title 18, United States Code, Section 1028A (Aggravated identity theft).

2. I am a Special Agent ("SA") with the Federal Bureau of Investigation ("FBI") and, as such, I am charged with enforcing all federal laws in all jurisdictions of the United States, its territories and possessions. I have been employed as an FBI SA since April 2022. I am currently assigned to the Omaha Field Office, Cedar Rapids Resident Agency. During my career as an SA, I have investigated several criminal violations and have received training at the Basic Field Training Course in Quantico, Virginia. As a result of my training and experience, my duties as an SA include, but are not limited to, conducting criminal investigations, serving legal process issued by the courts, and executing search and arrest warrants. This affidavit is intended to show only that there is sufficient probable cause for the requested warrant and does not set forth all of my knowledge about this matter.

3. On January 31, 2023, the University of Iowa Police Department ("UIPD") was notified of a report filed by William Donald Woods ("California Bill") to the University of Iowa Hospital and Clinics ("UIHC") compliance office which claimed that UIHC employee William David Woods' ("Wisconsin Bill") true name was Matthew "Kerns." California Bill claimed that Wisconsin Bill stole his identity 33 years ago, including his name and Social Security account number ("SSN"), when the two worked together at a hotdog cart in Albuquerque, New Mexico.

4. On January 31, 2023, UIPD Detective Ian Mallory was notified by the UIHC of the report filed by California Bill and opened an investigation into this matter.

5. Through investigative steps taken by Detective Mallory and other investigators, the UIPD discovered that Wisconsin Bill's true identity is Matthew David Keirans, date of birth ("DOB") January 12, 1966. The UIPD also confirmed through DNA testing that California Bill's true identity is William Donald Woods.

6. On July 17, 2023, Keirans was taken into custody in Johnson County, Iowa, for two fraudulent document charges. Following his arrest, Keirans was interviewed by Detective Mallory. During the interview, Keirans admitted to criminal acts starting in 1990 under the false identity of William David Woods. Keirans admitted to using the false identity in every aspect of his life requiring identification, including but not limited to: criminal acts and prosecution, taxes, insurance acquisition and claims, social security, drivers' licenses, vehicle registration, titles, deeds, loans, credit, purchase agreements, and official reports

and documents entered into the public record using the name, or variants of the name "William D. Woods."

7. During the interview, Keirans also admitted to providing fraudulent documents to authorities in Los Angeles ("LA") County, California, from his residence in Wisconsin to aid in the arrest, prosecution, and incarceration of the real William D. Woods (California Bill) and also admitted to filing an additional report to the Hartland, Wisconsin, Police. According to information from the UIPD, California Bill spent 428 days in jail and 147 days in a hospital following his arrest on August 20, 2019, based on the fraudulent complaint and documents provided to LA County authorities by Wisconsin Bill.

8. On July 18, 2023, following his arrest, Keirans was positively identified by FBI fingerprint records that linked Keirans to FBI number 671610DA1.

9. Records obtained from Dupaco Community Credit Union ("DCCU"), a NCUA insured institution, located at 1000 Jackson Street, Dubuque, Iowa, indicated that beginning on March 14, 2016, and continuing to December 7, 2022, Keirans opened multiple accounts using California Bill's name, DOB, and SSN.

10. DCCU records indicate that on March 14, 2016, Keirans applied for and subsequently was approved for a Visa Platinum Credit Card using California Bill's identity with a credit limit of \$11,000. On the credit card application, Keirans provided DCCU member number 20064327.

11. DCCU records indicate that on August 19, 2016, Keirans applied for an auto loan and subsequently received loan number 101576122, in the amount of \$25,400, for a 2016 Jeep Cherokee, vehicle identification number ("VIN") 1C4PJMCB9GW361444. On the loan application and all supplemental loan forms, Keirans used California Bill's name, DOB, and SSN.

12. DCCU records indicate that on July 3, 2018, Keirans applied for an auto loan and subsequently received loan number 102044948, in the amount of \$32,404, for a 2019 Jeep Cherokee, VIN 1C4PJMLN3KD117013. On the loan application and all supplemental loan forms, Keirans used California Bill's name, DOB, and SSN.

13. DCCU records indicate that on July 18, 2018, Keirans applied for an auto loan and subsequently received loan number loan 102055795, in the amount of \$16,803.12, for a 2018 Jeep Grand Cherokee, VIN 1C4PJMLXXJD599222. On the loan application and all supplemental loan forms, Keirans used California Bill's name, DOB, and SSN.

14. DCCU records indicate that on October 23, 2019, Keirans applied for a loan and subsequently received loan number 102395639, in the amount of \$27,029.87, using his 2018 Jeep Grand Cherokee, VIN 1C4PJMLXXJD599222 as collateral. On the loan application and all supplemental loan forms, Keirans used California Bill's name, DOB, and SSN.

15. DCCU records indicate that on October 23, 2019, Keirans also applied for a personal loan and subsequently received loan number 102395688, in the

amount of \$15,771.77. On the loan application and all supplemental loan forms, Keirans used California Bill's name, DOB, and SSN.

16. DCCU records indicate that on May 23, 2022, Keirans applied for a loan and subsequently received loan number 103058848, in the amount of \$27,182.24, using his 2018 Jeep Grand Cherokee, VIN 1C4PJMLXXJD599222 as collateral. On the loan application and all supplemental loan forms, Keirans used California Bill's name, DOB, and SSN.

17. Based on the facts and circumstances outlined above, I believe Keirans knowingly provided false statements and records to a NCUA insured institution. I also believe that Keirans knowingly used that identity of another individual while he provided the false statements and records to the NCUA in the Northern District of Iowa. Therefore, there is probable cause to believe that Matthew David Keirans, also known as "William Donald Woods," violated Title 18, United States Code, Section 1014 (False statements to a National Credit Union Administration insured institution) and Title 18, United States Code, Section 1028A (Aggravated identity theft).

Respectfully submitted,



Daniel F. Peczuh
Special Agent
Federal Bureau of Investigation

Subscribed and sworn to before me by telephone or other electronic means
this 29th day of August, 2023.



MARK A. ROBERTS
United States Magistrate Judge
Northern District of Iowa